

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

DONNA WHITE

V.

**MEDICAL CENTER HOSPITAL,
MEDICAL CENTER HEALTH SYSTEM
& HEALTH CAROUSEL, INC.**

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CIVIL ACTION NO. 7:19-CV-00066-DC

**DEFENDANTS' STIPULATION
TO EXTEND MCH'S VENUE RESPONSE DEADLINE**

COME NOW Defendants, Ector County Hospital District d/b/a Medical Center Hospital and/or d/b/a Medical Center Health System, incorrectly named "Medical Center Hospital" and "Medical Center Health System" (collectively "MCH") and Defendant Health Carousel, Inc. ("HC") (collectively the "Parties"), and file this Stipulation to Extend MCH's Venue Response Deadline. In support hereof, the Parties would respectfully show the Court as follows:

I.

On 5-8-19, HC filed its Motion to Transfer Venue (Doc. No. 8). The Parties conferred, through their attorneys, regarding extending the date by which MCH may file its Response thereto. To allow MCH and HC additional time to work through the venue issues between them, the Parties stipulate, subject to the Court's approval, that the deadline by which MCH may respond to HC's Motion to Transfer Venue shall be the later of June 7, 2019, or ten (10) days after the Court's disposition of MCH's previously filed Rule 12(b)(6) Motion to Dismiss (Doc. No. 7).

Good cause exists to extend the deadline to allow MCH and HC the opportunity to fully evaluate the venue issues as between one another. Further, the Court's disposition of MCH's

Rule 12(b)(6) Motion to Dismiss might be instructive or dispositive of MCH's need to respond to HC's venue motion. There have been no prior extensions of time to respond to HC's Motion to Transfer Venue, and because the Motion was recently filed, there appears to be no prejudice extending the time allowing MCH to respond.

WHEREFORE, PREMISES CONSIDERED, and subject to the Court's approval, the Parties stipulate that MCH shall have up to and including the later of June 7, 2019, or ten (10) days after the Court's disposition of MCH's Rule 12(b)(6) Motion to Dismiss, to answer or otherwise respond to HC's Motion to Transfer Venue.

IT IS SO STIPULATED.

Dated: May 17, 2019

SHAFFER, DAVIS, O'LEARY & STOKER

700 N. Grant, Suite 201, 79761

P. O. Drawer 1552

Odessa, Texas 79760-1552

Telephone: 432.332.0893

Facsimile: 432.333.5002

By: /s/ Miles R. Nelson

Miles R. Nelson

State Bar No. 14904750

Email: mnelson@shaferfirm.com

R. Layne Rouse

State Bar No. 24066007

Email: lrouse@shaferfirm.com

**ATTORNEYS FOR DEFENDANT ECTOR
COUNTY HOSPITAL DISTRICT**

Dated: May 17, 2019

JAMES L. DOYLE II LAW FIRM

1018 Preston, Ste. 850

Houston, Texas 77002

Telephone: 713-224-5066

Facsimile: 713-224-5055

By: /s/ James L. Doyle, II

James L. Doyle, II

State Bar No. 060944450

jim@jimdoylelaw.com

***ATTORNEYS FOR DEFENDANT HEALTH
CAROUSEL, INC.***

IT IS SO ORDERED.

Dated: _____

PRESIDING JUDGE

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document is being served on this 17th day of May, 2019 to all counsel of record as shown below.

Via Email: Ditty.bhatti@bhattilawfirm.com

Ditty S. Bhatti
The Bhatti Law Firm, PLLC
14785 Preston Road, Suite 550
Dallas, TX 75254
Attorney for Plaintiff

Via Email: jim@jimdoylelaw.com

Jim Doyle
Jim Doyle Law Firm
1018 Preston, Suite 850
Houston, Texas. 77002
Attorney for Defendant
Health Carousel, LLC

/s/ Miles Nelson

Miles Nelson
R. Layne Rouse